

Central Valley Regional Water Quality Control Board

4 June 2014

Parry Klassen, Executive Director
East San Joaquin Water Quality Coalition
1201 L Street
Modesto, CA 95354

CONDITIONAL APPROVAL OF EAST SAN JOAQUIN WATER QUALITY COALITION'S GROUNDWATER QUALITY ASSESSMENT REPORT

Thank you for submitting the 13 January 2014 East San Joaquin Water Quality Coalition's (Coalition) Groundwater Quality Assessment Report (GAR), as required by the Waste Discharge Requirements General Order R5-2012-0116-R2 (Order).

Based on the information in the submitted documents and the attached staff review, the GAR addresses the Order's main objectives to determine high and low vulnerability areas, establish priorities within high vulnerability areas, and provide a basis for further workplan and management plan requirements. However, based on the staff review, there are some important issues that must be addressed prior to my issuing final approval of the GAR. Therefore, I am conditionally approving the Coalition's GAR. For the final approval, a revised GAR or addendum to the GAR must be submitted by **11 August 2014** and address the following items:

1. Include map(s) that show the location of small disadvantaged communities reliant on groundwater through domestic well use or small water systems, where such information is available or can be inferred from existing information.
2. Revise the priorities within high vulnerability areas to ensure small disadvantaged communities reliant on groundwater are the highest priority for implementation of management plans.
3. Include map(s) that show the locations of wells with nitrate concentrations between 5 and 10 mg/L.
4. Include a discussion and rationale for excluding from the proposed East San Joaquin Water Quality Coalition High Vulnerability Area (ESJHVA) all wells with the observed nitrate concentration above 5 mg/L and below 10 mg/L, or include such wells in the methodology for designating the ESJHVA.

In addition, a signature and seal under the California Business and Professions Code §7835/§6735(a) should be affixed. Compliance dates associated with this conditional approval are enclosed (Table 1). The remaining items identified in the staff review must be included in applicable workplans or in the 2019 GAR update (Table 2).

If you have any questions or comments regarding this letter, please contact Joe Karkoski at Joe.Karkoski@waterboards.ca.gov or by phone at 916-464-4668.

Original signed by

Pamela C. Creedon
Executive Officer

Enclosure: Staff Review of GAR

Table 1. Compliance dates associated with the conditional approval of the East San Joaquin Water Quality Coalition's Groundwater Quality Assessment Report (GAR) on 4 June 2014.

Due Date*	Requirements
+60 days**	Comprehensive Groundwater Quality Management Plan (24 January 2014 letter issued by the Executive Officer)
23 September 2014	Identification of the technical experts who will prepare and implement the workplans for the Management Practices Evaluation Program Group (18 March 2014 conditional approval of MPEP Group)
4 June 2015	Groundwater Quality Trend Monitoring Workplan (VIII.D.3) Groundwater QAPP for Trend Monitoring (AttB IX)
4 June 2016	Management Practices Evaluation Program Group Workplan (VIII.D.2.a) Groundwater QAPP for MPEP (AttB IX)
4 June 2019	Review, and confirm or modify vulnerability designations (AttB IV.A.4) GAR update

* Based on the effective dates following the approval of the GAR.

** Following the final approval of the vulnerability and prioritization of areas.

Table 2. Schedule for providing additional information in future deliverables.

Deliverable	Items Identified in Staff Review
Trend Monitoring Workplan and MPEP Workplan	Propose plans to address identified geographic and temporal gaps in existing groundwater quality data Include a map(s) of agricultural land use in the Peripheral Area. Annual spatial crop data are available from the USDA NASS. Propose prioritization of wells in the Peripheral Area if there is irrigated agriculture in the vicinity that could impact the well. Provide detailed contour maps and analyses of local flow conditions for any areas that are monitored or studied, or are addressed by a management plan. Assess the possibility of data sharing between the data-collecting entity, the third-party, and the Central Valley Water Board for existing monitoring networks. Determine the merit and feasibility of incorporating existing data collection efforts and well systems for obtaining groundwater quality information. Include a map(s) and information on tile drains within the Coalition area. The effort to reach out to irrigation districts and growers should be documented.
2019 GAR Update	Categorize wells based on known depth rather than the well type. Provide rationale for selecting a depth threshold for well classification, and discuss the sensitivity of analyses to depth threshold or classification methodology (e.g. above/below Corcoran Clay). Include information on hydraulic conductivity of the underlying aquifer as measured through aquifer testing (e.g., pumping tests and slug tests). Group turf farms appropriately based on nitrogen application rates.